

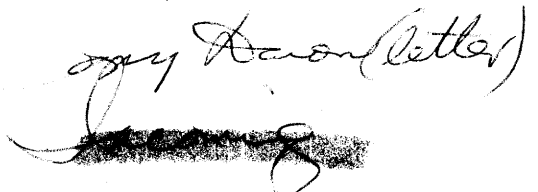
**PLATEAU  
MINING  
CORPORATION**

Willow Creek Mine  
847 NW Hwy 191  
Helper, Utah 84526  
(435) 472-0475  
Fax: (435) 472-4780

An affiliate of **RAG**

June 11, 2001

Mr. Daron R. Haddock  
Utah Division of Oil, Gas and Mining  
1594 West North Temple, Suite 1210  
P.O. Box 145801  
Salt Lake City, Utah 84114-5801

*Daron R. Haddock*  


Re: Response to Deficiencies, Silo Demolition, Plateau Mining Corporation, Star Point Mine,  
C/984/984 AM01B, Carbon County, Utah

AM01B-1

Dear Mr. Haddock:

Plateau Mining Corporation (PMC) is submitting the aforementioned. In addition to the enclosed C1 and C2 Forms, PMC is providing additional clarification to the outstanding deficiencies below.

**R645-301-114,** *The applicant needs to show it has right of entry for the area proposed to be disturbed.* The application to amend the existing BLM Right of Way U-52409 has been sent to the BLM and will be reviewed by Mr. Mark Mackiewicz as soon as he completes the Environmental Impact Statement (EIS) for the Questar, Williams, and Kern River Pipeline Project. The demands of this EIS has not afforded Mr. Mackiewicz the time to review PMC's request. Therefore, in order to keep the project on track and procure seed, transplants, and mulching supplies, PMC is requesting approval of this amendment with a condition precluding right of entry until authorized by the BLM.

**R645-301-230,** *The applicant needs to say how much soil will be salvaged and how it will be stored.* PMC has revised page 200-21, to commit to delineating the area to be affected in the field prior to any disturbance and removing from the affected area the top one-foot of the soil material, stockpiling, signing, and protecting the soil resources during the razing of the silo operations.

**R645-301-240,** *The current mining and reclamation plan contains a commitment to investigate various methods of reclaiming soils derived from Mancos Shale parent material. Assuming this has happened, the applicant needs to incorporate results of this testing in the mining and reclamation plan.* The Permittee has not performed any investigation of various methods for reclaiming soils derived from Mancos Shale parent material. This statement is being removed from the plan as shown on the enclosed page 200-27. However, PMC does believe that its proposed soil preparation, gouging and mulching methodology will provide a method by which reclaiming soils from the Mancos can be evaluated.

PMC does not intend to use any fertilizer during the reclamation of this area, or any other area associated with the Star Point Mine.

**RECEIVED**

JUN 15 2001

DIVISION OF  
OIL, GAS AND MINING

Mr. Daron R. Haddock  
June 11, 2001  
Page 2

**R645-301-353**, *The seed mixture, rates and timing must be changed to encourage vegetative cover that is comprised of species native to the area, have the same season characteristics of growth and be capable of plant succession.* The enclosed revised seed mix has been generated with Ms. Susan Whites's invaluable recommendations. As the Division knows, often times a seed mix will need to be altered due to seed availability; therefore, a timely decision on the amendment would facilitate the Permittee's ability to commence with the seed procurement process.

Regarding the issue of warm season species, it was observed by Ms. White and Mr. Paul Baker during a site visit that there did not appear to be any warm season species in the area and that warm season seeding was not necessary. Furthermore, it has always been the Permittee's belief that seeding should occur as soon after the seed bed is prepared and prior to any crusting of the soil surface. The concept of warm season seeding is worthy of consideration, but the implementation is also worthy of consideration.

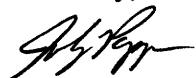
**R645-301-358**, *A commitment must be made to survey the silo prior to demolition for animal species of concern.* PMC has a commitment in its mining and reclamation plan on page 300-36, which is difficult to find in the many pages of the permit, that states "PMC will, however, continue to conduct site specific monitoring during demolition and reclamation activities". Presently, the razing of the silo is not anticipated until the middle to latter part of August.

If this commitment does not adequately address the deficiency, then the Permittee can provide further verbiage as necessary.

PMC believes that it has adequately addressed the deficiencies identified by the Division, with the exception of the right of entry, whereby approval of the silo demolition amendment can be approved with a condition that access to area covered within the amendment to right of way U-52409 is precluded until BLM approval is granted.

If the Division has any questions, please do not hesitate to contact me at (435) 472-4741.

Sincerely,



Johnny Pappas  
Sr. Environmental Engineer

Enclosures

# APPLICATION FOR PERMIT PROCESSING

Permit Change ☒New Permit ☐Renewal ☐Transfer ☐Exploration ☐Bond Release ☐

Permit Number: C/007/006

Title of Proposal: Silo Demolition - Reclamation disturbed area boundary expansion. Response to April 27, 2001 Technical Analysis.

Mine: STAR POINT MINES

Permittee: PLATEAU MINING CORP.

Description, include reason for application and timing required to implement:

Response to Technical Analysis - Deficiencies

**Instructions:** If you answer yes to any of the first 8 questions (gray), submit the application to the Salt Lake Office. Otherwise, you may submit it to your reclamation specialist.

- |   |  |  |
|---|--|--|
| <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No            | 1. Change in the size of the Permit Area? _____ acres Disturbed Area? 0.98 _____ acres <input checked="" type="checkbox"/> increase <input type="checkbox"/> decrease. |
| <input type="checkbox"/> Yes            | <input checked="" type="checkbox"/> No | 2. Is the application submitted as a result of a Division Order? DO #  |
| <input type="checkbox"/> Yes            | <input checked="" type="checkbox"/> No | 3. Does application include operations outside a previously identified Cumulative Hydrologic Impact Area?  |
| <input type="checkbox"/> Yes            | <input checked="" type="checkbox"/> No | 4. Does application include operations in hydrologic basins other than as currently approved?  |
| <input type="checkbox"/> Yes            | <input checked="" type="checkbox"/> No | 5. Does application result from cancellation, reduction or increase of insurance or reclamation bond?  |
| <input type="checkbox"/> Yes            | <input checked="" type="checkbox"/> No | 6. Does the application require or include public notice/publication?  |
| <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No            | 7. Does the application require or include ownership, control, right-of-entry, or compliance information?  |
| <input type="checkbox"/> Yes            | <input checked="" type="checkbox"/> No | 8. Is proposed activity within 100 feet of a public road or cemetery or 300 feet of an occupied dwelling?  |
| <input type="checkbox"/> Yes            | <input checked="" type="checkbox"/> No | 9. Is the application submitted as a result of a Violation? NOV #  |
| <input type="checkbox"/> Yes            | <input checked="" type="checkbox"/> No | 10. Is the application submitted as a result of other laws or regulations or policies? Explain:  |
| <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No            | 11. Does the application affect the surface landowner or change the post mining land use? BLM R-0-W Amendment  |
| <input type="checkbox"/> Yes            | <input checked="" type="checkbox"/> No | 12. Does the application require or include underground design or mine sequence and timing? (Modification of R2P2?)  |
| <input type="checkbox"/> Yes            | <input checked="" type="checkbox"/> No | 13. Does the application require or include collection and reporting of any baseline information?  |
| <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No            | 14. Could the application have any effect on wildlife or vegetation outside the current disturbed area?  |
| <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No            | 15. Does application require or include soil removal, storage or placement?  |
| <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No            | 16. Does the application require or include vegetation monitoring, removal or revegetation activities?   |
| <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No            | 17. Does the application require or include construction, modification, or removal of surface facilities?  |
| <input type="checkbox"/> Yes            | <input checked="" type="checkbox"/> No | 18. Does the application require or include water monitoring, sediment or drainage control measures?   |
| <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No            | 19. Does the application require or include certified designs, maps, or calculations?  |
| <input type="checkbox"/> Yes            | <input checked="" type="checkbox"/> No | 20. Does the application require or include subsidence control or monitoring?  |
| <input type="checkbox"/> Yes            | <input checked="" type="checkbox"/> No | 21. Have reclamation costs for bonding been provided for?  |
| <input type="checkbox"/> Yes            | <input checked="" type="checkbox"/> No | 22. Does application involve a perennial stream, a stream buffer zone or discharges to a stream?   |
| <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No            | 23. Does the application affect permits issued by other agencies or permits issued to other entities? BLM R-O-W U52409   |

**Attach 5 complete copies of the application.**

I hereby certify that I am a responsible official of the applicant and that the information contained in this application is true and correct to the best of my information and belief in all respects with the laws of Utah in reference to commitments, undertakings, and obligations, herein. (R645-301-123)

JOHNNY PAPPA - Senior Engineer 6/13/01  
Signed Name - Position - Date

Subscribed and sworn to before me this 13<sup>th</sup> day of June, 2001

My Commission Expires:  
Attest: STATE OF  
COUNTY OF

Notary Public

Utah

February 24, 2005

Carbon



**KIMBERLY COLEMAN**  
NOTARY PUBLIC - STATE OF UTAH  
141 SOUTH 500 EAST  
PRICE, UT 84501  
COMM. EXP. 2-24-2005

Received by Oil, Gas &amp; Mining

ASSIGNED TRACKING NUMBER

**Title of Application:**

Permit Number: C/007/006

Mine: STAR POINT

Permittee: PLATEAU MINING CORP.

DESCRIPTION OF MAP, TEXT, OR MATERIALS TO BE CHANGED

[illegible]

**Any other specific or special instructions required for insertion of this proposal into the Mining and Reclamation Plan?**